

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

YAACOV APELBAUM, a New York resident,
and XRVISION, LTD., a New York corporation,

Case No. 2:23-cv-11718

Hon. Stephen J. Murphy, III

Plaintiffs,

v.

STEFANIE LAMBERT, a Michigan resident, and
THE LAW OFFICE OF STEFANIE L. LAMBERT, PLLC,
A Michigan professional limited liability company
And BILL BACHENBERG, a Pennsylvania resident,

Defendants.

BURNS LAW FIRM

John C. Burns*
Attorneys for Plaintiffs
PO Box 191250
St. Louis, Missouri 63119
(314) 329-5040
TBLF@pm.me
*admission to the Eastern District
Of Michigan pending

STUART LAW, PLC

Todd A. Stuart
Attorneys for Plaintiffs
429 Turner Ave. NW
Grand Rapids, MI 49504
(616) 284-1658
tstuart@stuartlawplc.com

**THE LAW FIRM OF MICHAEL J.
SMITH AND ASSOCIATES, PLLC**

Michael J. Smith (P36706)
Jacob A. Perrone (P71915)
Daniel L. Price (P60353)
Attorneys for Defendant, BILL
BACHENBERG ONLY
70 Macomb Place, Suite 200
Mt. Clemens, MI 48043
(586) 254-0200
msmith@mikesmithlaw.com
jperrone@mikesmithlaw.com
dprice@mikesmithlaw.com

**DEFENDANT BILL BACHENBERG'S ANSWER TO THE COMPLAINT AND
RELIANCE ON JURY DEMAND**

NOW COMES Defendant, **BILL BACHENBERG**, by and through his attorneys, **THE LAW FIRM OF MICHAEL J. SMITH AND ASSOCIATES, PLLC.**, and for his Answer to Plaintiff's Complaint, states onto this Honorable Court as follows:

1. In Answer to Paragraph one (1) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.
2. In Answer to Paragraph two (2) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.
3. In Answer to Paragraph three (3) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.
4. In Answer to Paragraph four (4) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.
5. In Answer to Paragraph five (5) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

6. This allegation pertains to a different Defendant and is not applicable to Defendant, BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
7. This allegation pertains to a different Defendant and is not applicable to Defendant, BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
8. In Answer to Paragraph eight (8) of Plaintiffs' Complaint, Defendant BACHENBERG admits the allegations contained therein, for the reason that same are true.
9. In Answer to Paragraph nine (9) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.
10. This allegation pertains to a different Defendant and is not applicable to Defendant, BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
11. In Answer to Paragraph eleven (11) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

12. In Answer to Paragraph twelve (12) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

GENERAL ALLEGATIONS

13. In Answer to Paragraph thirteen (13) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

14. In Answer to Paragraph fourteen (14) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

15. In Answer to Paragraph fifteen (15) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

16. In Answer to Paragraph sixteen (16) This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

17. In Answer to Paragraph seventeen (17) of Plaintiffs' complaint, this allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To

the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

18. In Answer to Paragraph eighteen (18) of Plaintiffs' complaint, this allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

19. In Answer to Paragraph nineteen (19) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

20. In Answer to Paragraph twenty (20) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

21. In Answer to Paragraph twenty-one (21) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

22. In Answer to Paragraph twenty-two (22) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

23. In Answer to Paragraph twenty-three (23) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

24. In Answer to Paragraph twenty-four (24) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

25. In Answer to Paragraph twenty-five (25) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

26. In Answer to Paragraph twenty-six (26) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

27. In Answer to Paragraph twenty-seven (27) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

28. In Answer to Paragraph twenty-eight (28) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

29. In Answer to Paragraph twenty-nine (29) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

30. In Answer to Paragraph thirty (30) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

31. In Answer to Paragraph thirty-one (31) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

32. In Answer to Paragraph thirty-two (32) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

33. In Answer to Paragraph thirty-three (33) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

34. In Answer to Paragraph thirty-four (34) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

35. In Answer to Paragraph thirty-five (35) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

36. In Answer to Paragraph thirty-six (36) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

37. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant

BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

38. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

39. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

40. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

41. In Answer to Paragraph forty-one (41) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

42. In Answer to Paragraph forty-two (42) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

43. In Answer to Paragraph forty-three (43) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

44. In Answer to Paragraph forty-four (44) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

45. In Answer to Paragraph forty-five (45) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

46. In Answer to Paragraph forty-six (46) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

47. In Answer to Paragraph forty-seven (47) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

48. In Answer to Paragraph forty-eight (48) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

49. In Answer to Paragraph forty-nine (49) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.
50. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
51. In Answer to Paragraph fifty-one (51) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.
52. In Answer to Paragraph fifty-two (52) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.
53. In Answer to Paragraph fifty-three (53) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.
54. In Answer to Paragraph fifty-four (54) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

55. In Answer to Paragraph fifty-five (55) of Plaintiffs' complaint, this allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

56. In Answer to Paragraph fifty-six (56) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

57. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

58. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

59. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

60. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
61. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
62. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

COUNT 1 – LIBEL WITH COMMON LAW MALICE

Brought by Plaintiffs Against Defendants Lambert and PLLC

63. Defendant incorporates by reference paragraphs 1-62 above, as if fully restated and set forth herein word for word.
64. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant

BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

65. This allegation pertains to a different Defendant and is not applicable to Defendant,

BILL BACHENBERG. To the extent an answer is necessary, Defendant

BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

66. This allegation pertains to a different Defendant and is not applicable to Defendant,

BILL BACHENBERG. To the extent an answer is necessary, Defendant

BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

67. This allegation pertains to a different Defendant and is not applicable to Defendant,

BILL BACHENBERG. To the extent an answer is necessary, Defendant

BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

68. This allegation pertains to a different Defendant and is not applicable to Defendant,

BILL BACHENBERG. To the extent an answer is necessary, Defendant

BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

69. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
70. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
71. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
72. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
73. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

74. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
75. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
76. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
77. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

78. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed against Defendant BACHENBERG and award Defendant BACHENBERG costs and attorney fees so wrongfully suffered.

COUNT 2 – LIBEL WITH ACTUAL MALICE

Brought by plaintiffs Against defendants Lambert and PLLC

79. Defendant incorporates by reference paragraphs 1-78 above, as it set forth fully herein word for word.

80. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

81. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

82. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
83. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
84. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
85. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
86. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

87. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
88. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
89. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
90. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

91. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
92. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
93. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
94. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.
95. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against Defendant BACHENBERG and award Defendant BACHENBERG costs and attorney fees so wrongfully suffered.

COUNT 3 – SLANDER WITH COMMON LAW MALICE

Brought by Plaintiffs Against Defendants Lambert and PLLC

96. Defendant BACHENBERG incorporates by reference paragraphs 1-95 above, as if set forth fully herein word for word.

97. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

98. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

99. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

100. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

101. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

102. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

103. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

104. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

105. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

106. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

107. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

108. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

109. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

110. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against Defendant BACHENBERG and award Defendant BACHENBERG costs and attorney fees so wrongfully suffered.

COUNT 4 – SLANDER WITH ACTUAL MALICE

Brought by Plaintiffs Against Defendants Lambert and PLLC

111. Defendant BACHENBERG incorporates by reference paragraphs 1-110 above, as if set forth fully herein word for word.

112. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

113. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

114. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

115. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

116. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

117. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

118. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

119. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

120. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

121. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

122. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

123. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

124. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

125. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

126. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

127. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

128. This allegation pertains to a different Defendant and is not applicable to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and, therefore, leaves Plaintiffs to their proofs.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against Defendant BACHENBERG and award Defendant BACHENBERG costs and attorney fees so wrongfully suffered. ss

COUNT 5 – BREACH OF CONTRACT

Brought by Plaintiffs Against Defendants Lambert, PLLC, and Bachenberg

129. Defendant BACHENBERG incorporates by reference paragraphs 1-128 above, as if set forth fully herein word for word.

130. In Answer to Paragraph one hundred thirty (130) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

131. In Answer to Paragraph one hundred thirty-one (131) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

132. In Answer to Paragraph one hundred thirty-two (132) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

133. In Answer to Paragraph one hundred thirty-three (133) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue, and by way of further answer, Defendant BACHENBERG never entered into a contract with Plaintiffs.

134. In Answer to Paragraph one hundred thirty-four (134) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue, and by way of further answer, Defendant BACHENBERG never entered into a contract with Plaintiffs.

135. In Answer to Paragraph one hundred thirty-five (135) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

136. In Answer to Paragraph one hundred thirty-six (136) of Plaintiffs' Complaint, Defendant BACHENBERG neither admits nor denies the allegations contained

herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against Defendant BACHENBERG and award Defendant BACHENBERG costs and attorney fees so wrongfully suffered.

COUNT 6 – TORTIOUS INTERFERENCE

Brought by Plaintiffs Against Defendants Lambert, and PLLC

137. Defendant BACHENBERG incorporates by reference paragraphs 1-136 above, as if set forth fully herein word for word.
138. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.
139. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.
140. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

141. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

142. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

143. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against Defendant BACHENBERG and award Defendant BACHENBERG costs and attorney fees so wrongfully suffered.

COUNT 7 – PROMISSORY ESTOPPEL

Brought by Plaintiffs Against Defendants Lambert, and PLLC

144. Defendant BACHENBERG incorporates by reference paragraphs 1-143 above, as if set forth fully herein word for word.

145. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiff to his proofs.

146. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

147. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

148. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary, Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs to their proofs.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against Defendant BACHENBERG and award Defendant BACHENBERG costs and attorney fees so wrongfully suffered.

COUNT 8 – PROMISSORY ESTOPPEL

Brought by Plaintiffs Against Defendant Bachenberg

149. Defendant incorporates by reference paragraphs 1-148 above, as it set forth fully herein word for word.

150. In Answer to Paragraph one hundred fifty (150) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

151. In Answer to Paragraph one hundred fifty-one (151) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

152. In Answer to Paragraph one hundred fifty-two (152) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

153. In Answer to Paragraph one hundred fifty-three (153) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against

Defendant BACHENBERG and award Defendant BACHENBERG costs and attorney fees so wrongfully suffered.

COUNT 9 – QUANTUM MERUIT / UNJUST ENRICHMENT

Brought by Plaintiffs Against Defendant Bachenberg

154. Defendant BACHENBERG incorporates by reference paragraphs 1-153 above, as it set forth fully herein word for word.

155. In Answer to Paragraph one hundred fifty-five (155) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

156. In Answer to Paragraph one hundred fifty-six (156) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

157. In Answer to Paragraph one hundred fifty-seven (157) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

158. In Answer to Paragraph one hundred fifty-eight (158) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

159. In Answer to Paragraph one hundred fifty-nine (159) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

160. In Answer to Paragraph one hundred sixty (160) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue.

161. In Answer to Paragraph one hundred sixty-one (161) of Plaintiffs' Complaint, Defendant BACHENBERG denies the allegations contained therein, for the reason that same are untrue, by way of further answer, Defendant BACHENBERG never entered into a contract with Plaintiffs'.

162. In answer to paragraph one hundred sixty-two (162) of Plaintiffs' complaint, Defendant BACHENBERG admits that the allegation contained therein, for the reason that same are true and by way of further answer, Defendant BACHENBERG vehemently states that he never entered into a contract with Plaintiffs.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against Defendant BACHENBERG and award Defendant costs and attorney fees so wrongfully suffered.

COUNT 10 – QUANTUM MERUIT / UNJUST ENRICHMENT

Brought by Plaintiffs Against Defendants Lambert and PLLC

163. Defendant BACHENBERG incorporates by reference paragraphs 1-162 above, as it set forth fully herein word for word.

164. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to

insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs' to their proofs.

165. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs' to their proofs.

166. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs' to their proofs.

167. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs' to their proofs.

168. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs' to their proofs.

169. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs' to their proofs.

170. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs' to their proofs.

171. This allegation is related to another Defendant and does not apply to Defendant, BILL BACHENBERG. To the extent an answer is necessary Defendant BACHENBERG neither admits nor denies the allegations contained herein, due to insufficient information or knowledge to establish a belief as to the truthfulness of the allegation, and therefore leaves Plaintiffs' to their proofs.

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against Defendant BACHENBERG and award Defendant costs and attorney fees so wrongfully suffered.

CONCLUSION AND PRAYER FOR RELIEF

WHEREFORE, Defendant BACHENBERG respectfully requests that this Honorable Court enter an order of dismissal with prejudice of the instant Complaint filed as against

Defendant BACHENBERG and award Defendant costs and attorney fees so wrongfully suffered.

Dated: November 22, 2023

Respectfully Submitted,

THE LAW FIRM OF MICHAEL J. SMITH
AND ASSOCIATES, PLLC

By: /S/ Michael J. Smith
Michael J. Smith (P36706)
70 Macomb Place, Suite 200
Mt. Clemens, MI 48043
(586) 254-0200
msmith@mikesmithlaw.com